

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

NEW MEXICO UNITED FOOD AND
COMMERCIAL WORKERS UNION'S AND
EMPLOYERS' HEALTH AND WELFARE TRUST
FUND, on behalf of itself and all others similarly
situated,

Plaintiff,

v.

PURDUE PHARMA L.P., PURDUE PHARMA,
INC., THE PURDUE FREDERICK COMPANY,
INC. d/b/a THE PURDUE FREDERICK
COMPANY, P.F. LABORATORIES, INC.,
ABBOTT LABORATORIES, ABBOTT
LABORATORIES, INC., MICHAEL FRIEDMAN,
HOWARD R. UDELL, PAUL D. GOLDENHEIM,
JOHN DOE Nos. 1 through 20, and JANE DOE Nos.
1 through 20,

Defendants.

Civil Action No. 07-cv-6916-JGK

MOTION TO ADMIT COUNSEL
PRO HAC VICE

FILED
U.S. DISTRICT COURT
S.D. OF N.Y.
2007 NOV - 1 PM 10:50

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Christopher A. Seeger, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice*
of:

Douglas R. Plymale
Murray Law Firm
650 Poydras Street
Suite 2150
New Orleans, Louisiana
Telephone: (504) 648-0180
Fax: (504) 648-0181

Douglas R. Plymale is a member in good standing of the Bar of the State of Louisiana.
There are no pending disciplinary proceedings against him in any State or Federal Court.

631622-2 \$25 11-1-07

Attached hereto as Exhibit 1 is Dr. Plymale's Affidavit, with Exhibit A, an original Certificate of Good Standing from the Louisiana Supreme Court.

Dated: October 31, 2007

Respectfully Submitted,

SEEGER WEISS LLP

By: 

Christopher A. Seeger (CS-4880)
One William Street
New York, NY 10004
Telephone: (212) 584-0700
Facsimile: (212) 584-0799

Counsel for Plaintiff and the Class

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**AFFIDAVIT OF CHRISTOPHER
A. SEEGER IN SUPPORT OF
MOTION TO ADMIT COUNSEL
*PRO HAC VICE***

State of New York)
)ss:
County of New York)

Christopher A. Seeger, being duly sworn, hereby deposes and says as follows:

1. I am a member of Seeger Wiess LLP, counsel for Movant, New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund ("Movant"), in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Movant's motion to admit Douglas R. Plymale as counsel *pro hac vice* to represent Movant in this matter.

2. I am a member in good standing of the bar of the State of New York, and was admitted to practice law in 1990. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.


3. I have known Douglas R. Plymale since 2002.

4. I have found Dr. Plymale to be a skilled attorney and a person of integrity. He is experienced in federal practice and is familiar with the Federal Rules of Civil Procedure.

5. Accordingly, I am pleased to move the admission of Douglas R. Plymale, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Douglas R. Plymale, *pro hac vice*, which is attached hereto.

WHEREFORE, it is respectfully requested that the motion to admit Douglas R. Plymale, *pro hac vice*, to represent Movants in the above-captioned matter, be granted.



Christopher A. Seeger

Sworn before me this 31st day
of OCTOBER, 2007



NOTARY PUBLIC

Jose D. Mora
Notary Public State of New York
No. 03-6062383 Qualified in Bronx County
Certificate Filed in New York County
Commission Expires August 6, 2009

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Civil Action No. 07-cv-6916-JGK

**AFFIDAVIT OF DOUGLAS R.
PLYMALE, ESQUIRE**

I, Douglas R. Plymale, Esquire, an associate of Murray Law Firm, declare the following under penalty of perjury:

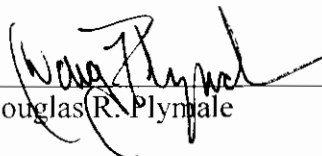
1. I am a member in good standing of the bars of the State of Louisiana and am admitted to practice before the United States District Courts for the Eastern District of Louisiana, the Middle District of Louisiana and the Western District of Louisiana. I have never been disciplined, suspended or disbarred by these or any other Court.

2. Attached hereto are Certificates attesting to my admission dates and that I am a member in good standing in the bar of the State of Louisiana.

3. I have extensive experience in state and federal trial courts. I also have extensive experience in pharmaceutical litigation, representing individuals, consumers, and third party payors against numerous pharmaceutical companies, including *In Re: Diet Drugs Litigation*.

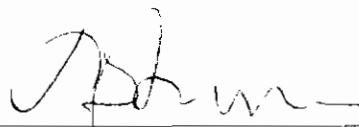
MDL 1203; *In Re: Propulsid Litigation*, MDL 1355; *In Re: Rezulin Products Liability Litigation*, MDL 1348; *In Re: Phenylpropanolamine (PPA) Products Liability Litigation*, MDL 1407; *In Re: Meridia Products Liability Litigation*, MDL 1481; *In Re: Serzone Products Liability Litigation*, MDL 1477; *In Re: Zyprexa Product Liability Litigation*, MDL 1596; *In Re: Oxycontin Antitrust Litigation*, MDL 1603; *In Re: Neurontin Marketing & Sales Practices Litigation*, MDL 1629; *In Re: Vioxx Litigation*, MDL 1657; *In Re: Bextra/Celebrex Marketing, Sales Practices, and Product Liability Litigation*, MDL 1699; and, *In Re: Fosamax Product Liability Litigation*, MDL 1769.

4. Based upon the foregoing, I respectfully request admission to this Court, pursuant to Rule 1.3(c) of the Local Rules of the United States District Courts for Southern District and Eastern District of New York, for the purpose of appearing and arguing on behalf of plaintiff, which is represented by the firm, Seeger Weiss LLP.



Douglas R. Plymale

Sworn before me this 19th day
of October, 2007



Notary Public
David L. Browne
Bar # 20729

United States of America

State of Louisiana

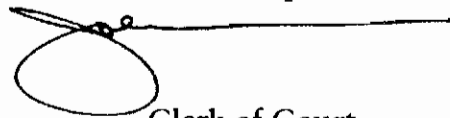
Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

DOUGLAS ROBERT PLYMALE, ESQ., #28409

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 11th Day of April, 2003 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign
my name and affix the seal of this Court,
at the City of New Orleans, this the 12th
Day of October, 2007, A.D.

A handwritten signature in black ink, appearing to read "John Tarlton Olivier", is written over a horizontal line. Below the signature is a circular embossed seal.

Clerk of Court
Supreme Court of Louisiana

CERTIFICATE OF SERVICE


I, Christopher A. Seeger, hereby certify that on October 31 2007, I caused a true and correct copy of the foregoing document, ***Motion to Admit Counsel Pro Hac Vice***, to be served via U.S. mail, with proper postage prepaid, on all counsel of record at the following addresses:

Michael Colbert Hartmere, Esq.
Matthew Terrence McLaughlin, Esq.
VENABLE (NYC)
405 Lexington Ave, 62nd Floor
New York, NY 10174
T. (212)-307-5500
F. (212)-307-5598 (fax)

Counsel for defendants Abbott Laboratories, Abbott Laboratories, Inc.

Alexandra Katherine Nellos, Esq.
Donald I. Strauber, Esq.
Phoebe Anne Wilkinson, Esq.
Mary Therese Yelenick, Esq.
CHADBOURNE & PARKE LLP (NY)
30 Rockefeller Plaza
New York, NY 10112
T. (212) 408-5100
F. (646) 710-1189

Counsel for defendants P.F. Laboratories, Inc., Purdue Pharma, Inc., Purdue Pharma, L.P., The Purdue Fredrick Company, Inc., Howard R. Udell, Michael Friedman, Paul D. Goldenheim


Christopher A. Seeger

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1 through 20,

Defendants.

Civil Action No. 07-cv-6916-JGK

**ORDER FOR ADMISSION
PRO HAC VICE ON
WRITTEN MOTION**

Upon the motion of Christopher A. Seeger, attorney for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, and said sponsor attorney's affidavit in support:

IT IS HEREBY ORDERED that:

Douglas R. Plymale
Murray Law Firm
650 Poydras Street
Suite 2150
New Orleans, Louisiana
Telephone: (504) 648-0180
Fax: (504) 648-0181
Email: dplymale@dugan-lawfirm.com

is admitted to practice *pro hac vice* as counsel for New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund in the above-captioned case in

the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: October __, 2007
New York, New York

United States District Court Judge